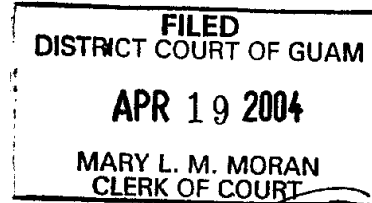


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Alan Sadhwani, et al.



IN THE UNITED STATES
DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,
Plaintiffs,

vs.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD., a
Foreign corporation, JOHN DOE I
through JOHN DOE X,
Defendants.

) CIVIL CASE NO. 03-00036
)
)
) PLAINTIFFS' EX PARTE MOTION TO
) COMPEL ANSWERS TO THIRD SET
) OF REQUESTS FOR PRODUCTION OF
) DOCUMENTS AND FOR SANCTIONS
) (F.R.C.P. 37(a); L.R. 37.1)
)
)
)
)
)
)
)

**TO: DEFENDANT HONGKONG SHANGHAI BANKING CORPORATION AND ITS
COUNSEL OF RECORD BRONZE & TANG:**

PLEASE TAKE NOTICE that Plaintiffs Alan Sadhwani, et al. will bring on for hearing their
Ex Parte Motion to Compel Answers to Third Set of Requests for Production of Documents and for
Sanctions, on April ____, 2004, at _____.m., or as soon as the Court may schedule the matter
to be heard, in the U.S. District Court of Guam, 4th Floor, U.S. Courthouse, 520 West Soledad
Avenue, Hagatna, Guam 96910.

///

This ex parte application is based on Local Rules 7.1(j) and 37.1 of the Local Rules of the U.S. District Court of Guam, Rules 26 and 37 of the Federal Rules of Civil Procedure, and all of the pleadings and files in this matter.

Dated this 19th day of April, 2004.

ARRIOLA, COWAN & ARRIOLA
Attorneys for Plaintiffs Alan Sadhwani, et al.

BY: Anita P. Arriola
ANITA P. ARRIOLA

CERTIFICATE OF SERVICE

I, ANITA P. ARRIOLA, hereby certify that on April 19, 2004, I caused to be served via hand delivery, a **PLAINTIFFS' EX PARTE MOTION TO COMPEL ANSWERS TO THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND FOR SANCTIONS (F.R.C.P. 37(a); L.R. 37.1)** to:

**Jacques A. Bronze, Esq.
Bronze & Tang, P.C.
2nd Floor, BankPacific Building
825 S. Marine Drive
Tamuning, Guam 96913**

Dated this 19th day of April, 2004.

Anita P. Arriola
ANITA P. ARRIOLA